



South Carolina Electric & Gas Company  
P.O. Box 88  
Jenkinsville, SC 29065  
(803) 345-4001

John L. Skolds  
Senior Vice President  
Nuclear Operations

DOCKETED  
USMRC

2

DOCKET NUMBER

PRM 50-59

July 6, 1994

Refer to: RC-94-0173 '94 JUL 11 P5:04

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

(59FR23641)

OFFICE OF SECRETARY  
DOCKETING SERVICE  
BRANCH

Attention: Docketing and Service Branch

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
COMMENTS ON VIRGINIA POWER COMPANY'S PETITION  
FOR RULEMAKING TO CHANGE THE FREQUENCY OF INDEPENDENT  
REVIEWS AND AUDITS OF SAFEGUARDS CONTINGENCY PLAN  
AND SECURITY PROGRAM

This letter provides comments on Virginia Power Company's petition for rulemaking to change the frequency with which each licensee conducts independent reviews and audits of its safeguards contingency plan and security program from annually to biennially.

South Carolina Electric & Gas Company (SCE&G) agrees that the frequency of independent reviews and audits should be more performance-based than schedule-driven.

SCE&G recommends that the Nuclear Regulatory Commission establish a common frequency requirement for all nuclear programs requiring an independent review and audit, to include safeguards contingency plan and security program. The frequency, scope, and depth of all independent reviews should be based on program performance indicators and include a provision that all aspects of a program are audited within a 36 month interval.

SCE&G appreciates the opportunity to review and provide comment on this petition for rulemaking.

Very truly yours,

John L. Skolds

RAM/JLS/nkk

c: O. W. Dixon  
R. R. Mahan  
R. J. White  
H. L. O'Quinn  
S. R. Hunt

NSRC  
RTS (PR 940014)  
Central File System  
File (811.02, 50.072)

9407150097 940706  
PDR PRM  
50-59

PDR

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

DS10